

EXHIBIT 70
FILED UNDER SEAL

SATURDAY, JUNE 10, 2023

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

CONFIDENTIAL: BSA PORTIONS UNDER SEPARATE COVER

— — —

GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 don't know.

2 Q. Irrespective of your
3 involvement with his accounts, the fact that
4 he had his accounts and the size of his
5 accounts at JPMorgan benefitted JPMorgan.

6 You would agree, right?

7 A. I think no -- you know, I don't
8 think any single client is that important,
9 but he was a client of the bank.

10 Q. And he continued to refer
11 clients to JPMorgan before, during and after
12 his incarceration, correct?

13 MR. GAIL: Objection.

14 THE WITNESS: I don't think he
15 referred clients to the bank. I met
16 clients through him, but I don't think
17 he was making a referral.

18 QUESTIONS BY MR. EDWARDS:

19 Q. Do you know who Thomas McGraw
20 is?

21 A. No.

22 Q. Do you remember a Tom McGraw in
23 the tax department of JPMorgan?

24 A. I don't.

25 Q. Did you ever become aware of